

AFFIDAVIT

Commonwealth of Pennsylvania
County of Erie

I, Keyia M. Terry, the undersigned, being duly sworn, state the following:

1. I am a resident of Erie, PA.
2. I am a former employee of the Booker T. Washington Center.
3. I was employed by the Booker T. Washington Center from November 1998 until September 2002 as Mr. James C. Sherrod's Executive Secretary.
4. As Mr. Sherrod's Executive Secretary, my duties included, but were not limited to, preparing interagency documents, transcribing meeting notes, preparing memorandums to staff, scheduling appointments, scheduling staff meetings, handling Board related activities and all other related responsibilities as directed.
5. As a regular part of my duties, I attended monthly staff meetings conducted by Mr. Sherrod.
6. I have been present at staff meetings where Mr. Sherrod has directed Mr. Brian Bessetti, the Center's Controller, to handle agency affairs in his extended absence.
7. This direction by Mr. Sherrod's was consistent with the Center's normal operating procedure and was well known to staff.
8. Mr. Sherrod was scheduled off for vacation from August 5 - August 9, 2002.
9. During the period of August 5 - 9, 2002, Mr. Bessetti was in charge of the Center, which included, but was not limited to, responsibility for the administration of agency programs and supervision of staff.
10. Prior to going on vacation, on August 2, 2002, Mr. Sherrod met with Mr. Sean Coleman, the Center's Vice -President, to discuss agency business, including Mr. Bessetti's assumption of Mr. Sherrod's duties from August 5 - August 9, 2002.
11. During the summer of 2002, from July 1, 2002-August 16, 2002, the Center operated its Summer Day Camp Program, a program of educational and recreational activities for children from the ages of 6 -14.
12. Prior to the start of the Summer Day Camp Program, as part of the agency normal operating procedure, Mr. Sherrod met with the Summer Day Camp Program staff to discuss the program, including staffing, activities, responsibilities and procedures.
13. On August 6, 2002, while Mr. Sherrod was on vacation, a child allegedly disappeared from a movie outing. It was later learned that the child was at an aunt's house.
14. On August 7, 2002, Mr. Sherrod returned to the agency to begin an investigation into the matter.
15. On August 13, 2002, at a staff meeting, I formally learned that Mr. Sherrod had been fired.
16. Two Board members, Mr. Sean Coleman and Mr. Paul Gambill, were present at this meeting, with Mr. Coleman conducting the meeting.
17. During this meeting, Mr. Coleman acknowledged referring to African American employees as "Niggers."
18. The Center did not take any action against Mr. Bessetti.


Keyia M. Terry

Sworn to and subscribed before me this 19 day of July 2003.


Notary Public

NOTARIAL SEAL
DANITA MOORE, NOTARY PUBLIC
ERIE, ERIE COUNTY, PENNA.
MY COMMISSION EXPIRES AUG. 25, 2003